

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: KIMBERLY BRIDGET FREEMAN

Chapter 13 No. 17-52392-KMS

**REPLY TO TRUSTEE'S MOTION
TO INCREASE PLAN PAYMENT (Dkt. 121)**

COMES NOW the above named Debtor, by and through Counsel, who files this Reply to the Trustee's Motion To Increase Plan Payment filed by the Debtor, and would show as follows:

Debtor Denies the allegations in the Trustee's Motion. The confirmed plan provides that Debtor will pay 100% of unsecured claims, up to \$10,000.00, to address the alleged value of certain real property Debtor owns jointly with her estranged husband who is in prison. Debtor would show that the most efficient solution to address the \$56,436 in unsecured claims would be to adjust the percentage paid to unsecureds to reflect the maximum of \$10,000, and then adjust the plan payment if and as necessary to reflect that increase.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that Trustee's Motion will be Dismissed, that the pleadings will be conformed to the evidence adduced at any trial or hearing hereon, and that the Debtor will be granted any and all other relief to which she may be entitled.

RESPECTFULLY submitted, this 28th day of September, 2018.

/s/ Allen Flowers
ALLEN FLOWERS
Counsel to Debtor
341 N. 25th Avenue
Hattiesburg, MS 39401
601/583-9300
MSB No. 7494

CERTIFICATE OF SERVICE

I, Allen Flowers, Attorney for the Debtors herein, do hereby certify that I have this day caused to be mailed a true and correct copy of the above and foregoing REPLY TO TRUSTEE'S RESPONSE TO MOTION TO INCREASE PLAN PAYMENT (Dkt. 121) by electronic transmission to via filing same with the Court's CM/ECF system to U.S. Trustee, Hon. J.C. Bell, Standing Trustee, to Hon. Samuel J. Duncan.

All on this, the 28th day of September, 2018.

/s/ Allen Flowers
ALLEN FLOWERS